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HAGOP T. BEDOYAN, CSB NO. 131285  
 KLEIN, DENATALE, GOLDNER,  
 COOPER, ROSENLIB & KIMBALL LLP  
 5260 N. Palm Avenue, Suite 205  
 Fresno, California 93704  
 Telephone: (559) 438-4374  
 Facsimile: (661) 326-0418  
 E-mail: [hbedoyan@kleinlaw.com](mailto:hbedoyan@kleinlaw.com)

Attorneys for Healthcare Conglomerate Associates, LLC  
 and Vi Healthcare Finance, Inc.

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

In re:  
 SOUTHERN INYO HEALTHCARE  
 DISTRICT,  
 Chapter 9 Debtor.

SOUTHERN INYO HEALTHCARE  
 DISTRICT, plaintiff  
 v.  
 HEALTHCARE CONGLOMERATE  
 ASSOCIATES, LLC; VI HEALTHCARE  
 FINANCE, INC.; and DOES 1 through 10,  
 defendants.

Case No.: 16-10015-A-9

Chapter 9

Adv. Case No.: 18-01031-A

DCN: JSS-01

Hearing

Date: November 29, 2018

Time: 2:00 p.m.

Place: 5<sup>th</sup> Fl. Ct. Rm. 11

United States Bankruptcy Court  
 2500 Tulare Street  
 Fresno, CA

Judge: Honorable Fredrick E. Clement

**STIPULATION TO CONTINUE HEARING ON MOTION FOR PRELIMINARY  
 INJUNCTION AGAINST VI HEALTHCARE FINANCE, INC., FOR SEQUESTRATION  
 OF TAX REVENUES PENDING FINAL RULING ON THE MERITS OF THIS  
ADVERSARY CASE OR FURTHER ORDER OF THIS COURT**

IT IS HEREBY STIPULATED AND AGREED by and between VI Healthcare Finance,  
 Inc. ("Defendant") and Southern Inyo Healthcare District ("Plaintiff"), by counsel, as follows:

1. On November 1, 2018, the Plaintiff a *Motion for Preliminary Injunction Against VI  
 Healthcare Finance, Inc., For Sequestration of Tax Revenues Pending Final Ruling On The Merits  
 Of This Adversary Case Or Further Order Of This Court* (the "Motion") [Dkt. No. 29].

1           2.       A hearing has been scheduled on the Motion to take place on November 29, 2018 at  
2       2:00 p.m.

3           3.       Unfortunately, counsel for the Defendant will be out of the country on vacation  
4       from November 20, 2018 through December 3, 2018, and he will not be able to appear for the  
5       Defendant at the currently scheduled hearing on the Motion on November 29, 2018.

6           4.       The Defendant has represented to the Plaintiff that it does not expect to receive  
7       any tax revenues from Inyo County before sometime in January of 2019.

8           5.       At the request of the Defendant, the Plaintiff agrees to continue the hearing on the  
9       Motion to December 19, 2018 at 2:00 p.m., provided that the Inyo County tax revenues at issue in  
10      the Motion (the "Tax Revenues") are protected from distribution to any party pending a  
11      determination on the Motion by the Court on December 19, 2018;

12          6.       Plaintiff may supplement its Motion on or before November 21, 2018; Opposition  
13      to the Motion shall be served and filed no later than December 7, 2018, and any reply to the  
14      opposition shall be served and filed no later than December 12, 2108.

15          7.       Plaintiff and Defendant agree that pending a determination on the Motion at the  
16      hearing on December 19, 2018 at 2:00 p.m., the Tax Revenues shall not be disbursed to either  
17      party and if any disbursement is inadvertently made, any and all Tax Revenues received shall be  
18      held and sequestered pending this Court's determination of the Motion.

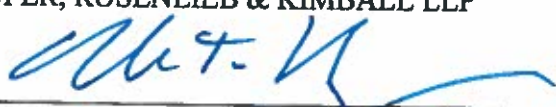
19          8.       This stipulation is without prejudice to the Defendant's right to oppose the Motion  
20      or otherwise oppose the adversary proceeding on the merits.

21          9.       The parties stipulate and agree to entry of an order approving this Stipulation.  
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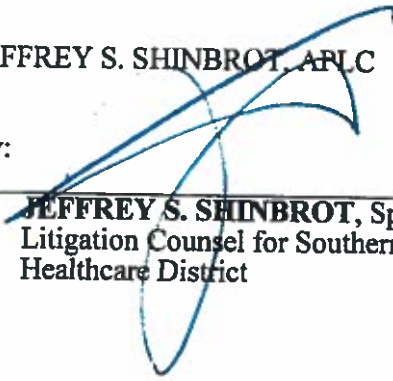
Dated: November 9, 2018

KLEIN, DENATALE, GOLDNER,  
COOPER, ROSENLIB & KIMBALL LLP

By:   
**HAGOP T. BEDOYAN**, Attorneys for  
Vi Healthcare Finance, Inc.

Dated: November 9, 2018

**JEFFREY S. SHINBROT, APLC**

By:   
**JEFFREY S. SHINBROT**, Special  
Litigation Counsel for Southern Inyo  
Healthcare District